

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HSBC BANK USA, N.A. AS TRUSTEE)
ON BEHALF OF ACE SECURITIES)
CORP. HOME EQUITY LOAN TRUST) Case No: 13 CV 04092
AND FOR THE REGISTERED)
HOLDERS OF ACE SECURITIES CORP.) Judge: Ronald A. Guzman
HOME EQUITY LOAN TRUST, SERIES)
2007-ASAP2, ASSET BACKED PASS-)
THROUGH CERTIFICATES,)
Plaintiff,)
)
v.)
)
PATRINA HAYES, MORTGAGE)
ELECTRONIC REGISTRATION)
SYSTEMS, INC. AS NOMINEE FOR)
CREVECOR MORTGAGE, INC.
Defendants.

**PLAINTIFF'S RULE 55 MOTION FOR DEFAULT JUDGMENT AND FOR ENTRY OF
JUDGMENT OF FORECLOSURE**

NOW COMES the Plaintiff, HSBC BANK USA, N.A. AS TRUSTEE ON BEHALF OF ACE SECURITIES CORP. HOME EQUITY LOAN TRUST AND FOR THE REGISTERED HOLDERS OF ACE SECURITIES CORP. HOME EQUITY LOAN TRUST, SERIES 2007- ASAP2, ASSET BACKED PASS-THROUGH CERTIFICATES, by Megan Christine Adams, one of its attorneys, and in support of its Motion for Default Judgment pursuant to Federal Rule of Civil Procedure 55, states as follows:

1. Plaintiff initiated these proceedings on June 03, 2014, seeking a Judgment of Foreclosure and Sale.

2. That the Defendants:
 - a. Patrina Hayes was served by INDIVIDUAL service on June 18, 2013. (*see* Docket Entry #6).
 - b. MERS, Inc., as Nominee for Creve Cor Mortgage Inc. was served by CORPORATE service on June 5, 2013. (*see* Docket Entry #7).
3. More than twenty (20) days have elapsed since Defendants were served, and he/she has failed to answer, plead, or otherwise defend the allegations of Plaintiff's Complaint.
4. Defendant's failure to defend and deny the allegations of Plaintiff's complaint results in those allegations being admitted and Plaintiff therefore moves the Court for the entry of Default Judgment.
5. Defendant's are not currently on active duty in the United States Military. (*see* Affidavit as to Military Service attached as Exhibit A).
6. Plaintiff's claim of damages is for a sum that is made certain by computation and is more specifically set forth in its supporting Judgment Affidavit. (*see* Affidavit of Amounts Due and Owing attached as Exhibit B; *see* Certificate of Prove-up of Foreclosure Fees and Costs attached as Exhibit C).

WHEREFORE, Plaintiff, moves this Honorable Court for an Order of Default against Defendant, Mortgage Electronic Registration Systems, Inc., as Nominee for Creve Cor Mortgage, Inc., and for Default Judgment of Foreclosure against the Defendant, PATRINA HAYES, and for that amount as set forth and made certain in its Judgment Affidavit and Certificate of Prove-up of Foreclosure Fees and Costs.

Respectfully submitted,

By: /s/ Megan Christine Adams

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